

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

SINGULAR COMPUTING LLC,

Plaintiff,

v.

Civil Action No.: 1:19-cv-12551 FDS

GOOGLE LLC

Defendant.

DEFENDANT GOOGLE LLC'S MOTION TO COMPEL

Defendant Google LLC (“Google”) hereby moves to compel Plaintiff Singular Computing LLC (“Singular”) to (1) produce documents responsive to Google’s Request for Production No. 68, including the test code, output files, and related documents that Singular relies upon to support its infringement contentions and the allegations in its complaint, (2) provide a narrative response to Google’s Interrogatory No. 11, and (3) provide a response to Google’s Interrogatory No. 14. Google submits the accompanying Memorandum of Law in Support of its Motion to Compel.

As set forth in Google’s Memorandum of Law, the discovery Google seeks from Singular is relevant to material facts at issue in the litigation and Singular has no justifiable reason for not providing the documents and information Google seeks. For these reasons, as set forth more fully in the accompanying Memorandum of Law, Google respectfully requests that this Honorable Court:

1. Order Singular to produce all documents responsive to Google’s Request for Production No. 68 including, but not limited to, the test code, output files, and related documents that Singular relies upon to support its infringement contentions and its complaint’s allegations within fourteen (14) days.

2. Order Singular to supplement its response to Interrogatory No. 11 by providing a narrative response to said interrogatory within fourteen (14) days.
3. Order Singular to provide a response to Interrogatory No. 14 within fourteen (14) days.

Respectfully submitted,

Dated: January 14, 2021

By: /s/ Nathan R. Speed

Gregory F. Corbett (BBO #646394)
gregory.corbett@wolfgreenfield.com

Nathan R. Speed (BBO # 670249)
nathan.speed@wolfgreenfield.com

Elizabeth A. DiMarco (BBO #681921)
elizabeth.dimarco@wolfgreenfield.com
WOLF, GREENFIELD & SACKS, P.C.
600 Atlantic Avenue
Boston, MA 02210
Telephone: (617) 646-8000
Fax: (617) 646-8646

Robert Van Nest (*admitted pro hac vice*)
rvannest@keker.com

Matthias Kamber (*admitted pro hac vice*)
mkamber@keker.com

Michelle Ybarra (*admitted pro hac vice*)
myabarra@keker.com

Jay Rapaport (*admitted pro hac vice*)
jrapaport@keker.com

Andrew Bruns (*admitted pro hac vice*)
abrungs@keker.com

Anna Porto (*admitted pro hac vice*)
apporto@keker.com

Deeva Shah (*admitted pro hac vice*)
dshah@keker.com

KEKER, VAN NEST & PETERS LLP
633 Battery Street
San Francisco, CA 94111-1809
(415) 391-5400

Michael S. Kwun (*admitted pro hac vice*)
mkwun@kblfirm.com

Asim Bhansali (*admitted pro hac vice*)
abhangsali@kblfirm.com

KWUN BHANSALI LAZARUS LLP
555 Montgomery Street, Suite 750 San
Francisco, CA 94111
(415) 630-2350
Counsel for Defendant Google LLC

LOCAL RULE 7.1(a)(2) CERTIFICATION

I, Nathan R. Speed, counsel for Defendant, hereby certifies that Defendant's counsel conferred with Plaintiff's counsel in a good-faith attempt to resolve or narrow the issue raised by this motion.

/s/ Nathan R. Speed
Nathan R. Speed

LOCAL RULE 37.1(b) CERTIFICATION

I, Nathan R. Speed, counsel for Defendant, hereby certify that the provisions of Rule 37.1 have been complied with.

/s/ Nathan R. Speed
Nathan R. Speed

CERTIFICATE OF SERVICE

I hereby certify that on this date, the foregoing pleading was served upon the attorneys of record for all parties by electronically filing the foregoing pleading with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to registered attorneys of record.

Dated: January 14, 2021

/s/ Nathan R. Speed
Nathan R. Speed